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IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SLABBED NEW MEDIA, LLC

Debtor

CHAPTER 11 CASE NO. 15-50963-KMS

NOTICE

PLEASE TAKE NOTICE that Slabbed New Media, LLC (the "Debtor") has filed a *Second Motion to Extend Debtor's Time to Remove Causes of Action* (the "Motion"), a copy of which is attached hereto as **Exhibit "A"** and incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Application must file a written objection or other responsive pleading within 21 days from and after the date of this Notice, with the Clerk of the Court, Danny L. Miller, United States Bankruptcy Court, Southern District of Mississippi, Gulfport Division, at Dan M. Russell, Jr., U. S. Courthouse, 2012 - 15th Street, Ste. 244, Gulfport, MS 39501, with a copy to Craig M. Geno, Esq., counsel for the Debtors, at the Law Offices of Craig M. Geno, PLLC, 587 Highland Colony Parkway, Ridgeland, MS 39157.

This, the $\mathcal{L}\mathcal{H}$ day of November, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

y:____

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
Jarret P. Nichols; MSB No. 99426
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com
jnichols@cmgenolaw.com

 $N. Wirm \ Data \ Users \ Bankrupt \ Slabbed \ New \ Media \ Pleadings \ Notice - Motion \ to \ Extend \ Debtor's \ Time \ to \ Remove \ Pre-Petition \ Cause \ of \ Action. \ wpd$

IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SLABBED NEW MEDIA, LLC

CHAPTER 11

CASE NO. 15-50963-KMS **Debtor**

SECOND MOTION TO EXTEND DEBTOR'S TIME TO REMOVE CAUSES OF ACTION

COMES NOW Slabbed New Media, LLC (the "Debtor"), and files this its Second Motion to Extend Debtor's Time to Remove Causes of Action (the "Motion"), and in support thereof, would show unto the Court the following, to-wit:

- On June 16, 2015, the Debtor herein filed with this Court its Voluntary Petition for 1. reorganization under Chapter 11 of the Bankruptcy Code.
- In conjunction with this Chapter 11 case, the Debtor is aware that certain pre-petition 2. claims may exist (and possibly post-petition claims as well), either directly or indirectly against the Debtor, that may need to be removed pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure.
- In order to fully protect the Debtor's rights regarding all pre-petition causes of action 3. and/or claims (pending as of the filing of this Motion), and/or all post-petition claims, the Debtor respectfully seeks herein to extend the time for removing pre and post-petition causes of action pursuant to Rule 9027 an additional ninety sixty (60) days from November 15, 2015, up to and including January 14, 2016, so that Debtor can obtain local counsel with Court approval to remove out of state cases.
- The Motion is in the best interest of all creditors and parties-in-interest and the 4. extension sought herein is not sought for the purposes of unreasonable delay.
- The Debtor submits that, in light of the relief requested, a Preliminary Order should 5. be entered in the event objections are filed prior to the time a final hearing may be held on this matter.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
Jarret P. Nichols; MSB No. 99426
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
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cmgeno@cmgenolaw.com
jnichols@cmgenolaw.com

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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq. Office of the United States Trustee <u>christopher.steiskel@usdoj.gov</u>

This, the _____day of November, 2015.

Craig M. Geno`